

June 05, 2023

EDWARD J. EMMONS, CLERK

U.S. BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA



CARLSON, CALLADINE & PETERSON, LLP

Colin C. Munro (SBN 195520)

1 Post St., Suite 500

San Francisco, California 94104

T: (415) 901-0967 / F: (415) 391-3898

cmunro@ccplaw.com

Signed and Filed: June 2, 2023

A handwritten signature in black ink, reading "Dennis Montali", is written over a horizontal line.

KIRKLAND & ELLIS LLP

KIRKLAND & ELLIS INTERNATIONAL LLP

Mark McKane, P.C. (SBN 230552)

Michael Esser (SBN 268634)

555 California Street

San Francisco, California 94104

T: (415) 439-1400 / F: (212) 439-1500

mark.mckane@kirkland.com

michael.esser@kirkland.com

-and-

Aparna Yenamandra, P.C. (admitted *pro hac vice*)

601 Lexington Avenue

New York, New York 10022

T: (212) 446-4800 / F: (212) 446-4900

aparna.yenamandra@kirkland.com

Attorneys for Calpine

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**ORDER APPROVING STIPULATION
BETWEEN THE REORGANIZED
DEBTORS AND CALPINE REGARDING
THE REORGANIZED DEBTORS' SIXTH
EXTENSION MOTION AND THE
MCCABE AND SAWMILL FIRE CLAIMS**

Re: Docket No. 13745

1 The Court having considered the *Stipulation Between the Reorganized Debtors and Calpine*
2 *Regarding the Reorganized Debtors' Sixth Extension Motion and the McCabe and Sawmill Fire*
3 *Claims* (the "Stipulation"), filed on June 1, 2023; and, pursuant to such stipulation and agreement of
4 the Parties,¹ and good cause appearing,

5 IT IS HEREBY ORDERED:

- 6 1. The Stipulation is approved.
- 7 2. Calpine shall not object to the Sixth Extension Motion, *provided that* the
8 Parties comply with the terms of this Stipulation.
- 9 3. The Reorganized Debtors shall provide a good faith settlement offer regarding
10 the McCabe and Sawmill Fire Claims to Calpine by no later than 4:00 p.m. (prevailing Pacific Time)
11 on June 16, 2023.
- 12 4. The Parties shall re-engage in good faith settlement discussions through
13 July 31, 2023, unless the McCabe and Sawmill Fire Claims are settled earlier.
- 14 5. Absent further agreement of the Parties to continue settlement discussions, if
15 no settlement is reached on or before July 31, 2023, then the Reorganized Debtors shall file
16 objections to the McCabe and Sawmill Fire Claims no later than August 30, 2023, or such later date
17 as the Parties shall agree.
- 18 6. This Stipulation shall be binding on the Parties and each of their successors
19 in interest.
- 20 7. This Stipulation shall constitute the entire agreement and understanding of the
21 Parties relating to the subject matter hereof and supersedes all prior agreements and understandings
22 relating to the subject matter hereof.
- 23
- 24
- 25
- 26

27 ¹ Capitalized terms not otherwise defined herein shall have the meaning ascribed to them in
28 the Stipulation.

1 8. This Stipulation may be executed in counterparts, each of which shall be
2 deemed an original but all of which together shall constitute one and the same agreement.

3 9. The Court shall retain jurisdiction to resolve any disputes or controversies
4 arising from this Stipulation or any order approving the terms of this Stipulation.

5
6
7 APPROVED AS TO FORM AND CONTENT:

8
9 Dated: June 1, 2023

10 WEIL, GOTSHAL & MANGES LLP
11 KELLER & BENVENUTTI LLP

12 /s/ Jane Kim

13 Jane Kim

14 *Attorneys for the Debtors*
15 *and Reorganized Debtors*

16
17 **END OF ORDER**
18
19
20
21
22
23
24
25
26
27
28